

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SHAUN GRAY, an individual,

Plaintiff,

v.

PARAMOUNT GLOBAL, a Delaware corporation; PARAMOUNT PICTURES CORPORATION, a Delaware corporation; PARAMOUNT STREAMING SERVICES INC., a Delaware corporation; and DOES 1-10,

Defendants.

Case No. 1:25-cv-03484-JSR

**DECLARATION OF MOLLY M. LENS IN SUPPORT
OF DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

I, Molly M. Lens, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a partner at O'Melveny & Myers LLP, counsel for Defendants Paramount Global, Paramount Pictures Corporation ("PPC"), and Paramount Streaming Services Inc. (collectively, "Defendants" or "Paramount") in this action, and a member of the Bar of this Court. I submit this declaration in support of Defendants' motion to dismiss based on my personal knowledge and review of the documents referenced herein. If called and sworn as a witness, I could and would testify competently thereto.

2. Attached hereto as **Exhibit A** is a true and correct copy of the U.S. Copyright Office's certificate of registration for the motion picture *Top Gun: Maverick*, bearing registration number PA 2-351-572. It was produced by Defendants with the Bates range PPC-GRAY-0000826-0000827.

3. Attached hereto as **Exhibit B** is a true and correct copy of the entry for *Top Gun: Maverick*'s copyright registration in the U.S. Copyright Office's Official Public Catalog, available at <https://cocatalog.loc.gov/>. It was produced by Defendants with the Bates number PPC-GRAY-0000829.

4. Attached hereto as **Exhibit C** is a true and correct copy of a May 1, 2019 email confirmation from the U.S. Copyright Office to Paramount notifying Paramount that the copyright preregistration for *Top Gun: Maverick* was successfully completed and listing the contents of that preregistration, bearing preregistration number PRE000010741. It was produced by Defendants with the Bates number PPC-GRAY-0000828.

5. Attached hereto as **Exhibit D** is a true and correct copy of the entry for *Top Gun: Maverick*'s copyright preregistration in the U.S. Copyright Office's Official Public Catalog,

available at <https://cocatalog.loc.gov/>. It was produced by Defendants with the Bates number PPC-GRAY-0000830.

6. Attached hereto as **Exhibit E** is a true and correct copy of the final screenplay for *Top Gun: Maverick*. This screenplay (defined as the “Screenplay” in Plaintiff’s Complaint, Compl. ¶ 7) is one of two works for which Plaintiff seeks a declaration of joint authorship and ownership in his Complaint, and it is referenced nearly 70 times throughout the Complaint. It was produced by Defendants with the Bates range PPC-GRAY-0000656-0000825.

7. Attached hereto as **Exhibit F** is a true and correct redacted copy of the contract between Eric Singer and PPC concerning Singer’s contemplated work on *Top Gun: Maverick*. It was produced by Defendants with the Bates range PPC-GRAY-0000174-0000250. The copy attached hereto has been redacted to facilitate its filing on the public docket while protecting Paramount’s confidential, sensitive commercial information from unwarranted disclosure, with such redacted information not relevant to Defendants’ motion. The content of this contract is discussed repeatedly in Plaintiff’s Complaint, *e.g.*, Compl. ¶¶ 7, 20, 27, 42.

8. Attached hereto as **Exhibits G to U** are true and correct copies of the fifteen so-called “Gray Scenes,” as defined in paragraph 30 of Plaintiff’s Complaint. They were produced by Plaintiff with the Bates range GRAY0001-GRAY0108. The Gray Scenes are the underlying works on which Plaintiff’s infringement claim is premised, and they are referenced more than 20 times in the Complaint.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 9, 2025.

By: /s/ Molly M. Lens

Molly M. Lens